

STEPHANIE M. HINDS (CABN 154284)

United States Attorney

MICHELLE LO (NYRN 4325163)

Chief, Civil Division

VIVIAN F. WANG (CABN 277577)

Assistant United States Attorney

450 Golden Gate Avenue, Box 36055

San Francisco, California 94102-3495

Telephone: (415) 436-7431

Fax: (415) 436-6548

Email: Vivian.Wang@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAHNAM DAVANI,

Defendant,

PLASTIKON INDUSTRIES, INC. and  
GOLDMAN SACHS & CO. LLC,

Garnishees.

CASE NO. CR 04-224-001 JSW

WRIT OF CONTINUING GARNISHMENT  
(WAGE GARNISHMENT)

TO: Plastikon Industries, Inc.  
Attn: Andrea Hampton, Payroll Administrator  
688 Sandoval Way  
Hayward, CA 94544-7129

**YOU ARE HEREBY COMMANDED TO GARNISH FOR THE BENEFIT OF THE  
UNITED STATES OF AMERICA PROPERTY IN YOUR POSSESSION IN WHICH THE  
DEFENDANT-JUDGMENT DEBTOR HAS A SUBSTANTIAL NONEXEMPT INTEREST.**

Writ of Continuing Garnishment  
Case No: CR 04-224-001 JSW

**FILED**

Jan 20 2023

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

1 The name, last known address and last four digits of the social security number of the person  
 2 who is the defendant-judgment debtor (“defendant”) in this action and whose property is subject to this  
 3 Writ are as follows:

4 Shahn timer Davani  
 5 127 Red Hill Circle  
 6 Tiburon, CA 94920  
 Social Security Number (last four digits): XXX-XX-7791

7 This Writ has been issued at the request of the United States of America to enforce the collection  
 8 of a criminal judgment entered in favor of the United States against the defendant for a debt in the  
 9 original amount of \$295,600.00. There current balance is approximately \$513,914.95. The United  
 10 States is entitled to recover a surcharge of ten percent (10%) of the amount of the balance (\$51,391.49)  
 11 pursuant to 28 U.S.C. § 3011(a). Thus, the total amount sought by this action is \$565,306.44.

12 The following are the steps that you must take to comply with this Writ. If you have any  
 13 questions, you should consult with your attorney.

14 1. Pursuant to 28 U.S.C. § 3205(c)(2)(F), if you have in your custody, control, or possession  
 15 any property of the defendant (including nonexempt disposable earnings from his wages, salary,  
 16 commissions or bonuses) in which the defendant has a substantial nonexempt interest, or if you obtain  
 17 custody, control, or possession of such property while this Writ is in effect, you must immediately  
 18 withhold such property from the defendant and retain it in your possession until you receive instructions  
 19 from the Court which will tell you what to do with the property. With respect to the defendant’s wages,  
 20 salary, commissions or bonuses; you must withhold twenty-five percent (25%) of such amount(s) after  
 21 all deductions required by law have been withheld. See 28 U.S.C. § 3205(a) and 3002(9).

22 2. Pursuant to 28 U.S.C. § 3205(c)(2)(E), you are required to answer this Writ within **10**  
 23 **days** after service of this Writ upon you. You must answer the Writ even if you do not have in your  
 24 custody, control, or possession, any property of the defendant. Pursuant to 28 U.S.C. § 3205(c)(4), your  
 25 answer must state, under oath, the following information:

26 a. Whether or not you have in your custody, control, or possession, any property  
 27 owned by the defendant in which the defendant has a substantial nonexempt interest, including  
 28 nonexempt disposable earnings;

b. a description of such property and the value of such property;

c. a description of any previous garnishments to which such property is subject and the extent to which any remaining property is not exempt; and

d. the amount of the debt you anticipate owing to the defendant in the future and whether the period for payment will be weekly or another specified period.

For your convenience, a form which addresses the above-requested information is attached and may be used to answer the Writ.

3. After you complete the answer under oath, pursuant to 28 U.S.C. § 3205(c)(2)(E) and (c)(4), within ten (10) days after service of this Writ upon you, you must **mail or deliver** the original answer bearing the original signature of the person preparing the answer to the Court at the following address:

Ronald V. Dellums Federal Building  
& United States Courthouse  
Attn: Clerk of Court  
1301 Clay Street  
Oakland, CA 94612

At the same time you mail or deliver the original answer to the Court, you must also **mail or deliver** a copy of the original answer to both the defendant and his attorney, and attorney for the United States at the following respective addresses:

Shahnam Davani  
127 Red Hill Circle  
Tiburon, CA 94920

Attorney for Shahnam Davani  
Christopher Cannon, Esq.  
Sugarman & Cannon  
737 Tehama Street, Unit 3  
San Francisco, California 94103

Vivian F. Wang  
Assistant U.S. Attorney  
450 Golden Gate Avenue, 9th Floor  
P.O. Box 36055  
San Francisco, CA 94102

Please note that the attached form answer contains a **certificate of service** which needs to be

completed by the person mailing the copies of the answer to the defendant and the attorney for the United States, and which needs to be filed with the Court along with the answer.

**IF YOU FAIL TO ANSWER THIS WRIT OR FAIL TO WITHHOLD PROPERTY IN ACCORDANCE WITH THIS WRIT, THE UNITED STATES MAY PETITION THE COURT FOR AN ORDER REQUIRING YOU TO APPEAR BEFORE THE COURT TO ANSWER THE WRIT AND TO WITHHOLD PROPERTY IN ACCORDANCE WITH THE WRIT BEFORE THE APPEARANCE DATE. IF YOU FAIL TO APPEAR OR DO APPEAR AND FAIL TO SHOW GOOD CAUSE WHY YOU FAILED TO COMPLY WITH THIS WRIT, THE COURT WILL ENTER A JUDGMENT AGAINST YOU FOR THE VALUE OF THE DEFENDANT'S NONEXEMPT INTEREST IN SUCH PROPERTY (INCLUDING NONEXEMPT DISPOSABLE EARNINGS). THE COURT MAY ALSO AWARD A REASONABLE ATTORNEY'S FEE TO THE UNITED STATES AND AGAINST YOU IF THE WRIT IS NOT ANSWERED WITHIN THE TIME SPECIFIED HEREIN AND IF THE UNITED STATES FILES A PETITION REQUIRING YOU TO APPEAR.**



MARK B. BUSBY,  
Clerk of Court  
United States District Court  
for the Northern District of California

A handwritten signature in black ink, appearing to read "Jessie Mosley".

Dated: January 20, 2023

By: Jessie Mosley  
Deputy Clerk